



FEDERAL ELECTION
COMMISSION

2012 MAR -2 AM 11:20

OFFICE OF GENERAL
COUNSEL

Hogan Lovells US LLP.
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004.
T +1 202 637 5600
F +1 202 637 5910
www.hoganlovells.com

March 30, 2012

Jeff Gordon
Supervising Attorney
Complaints Examination and Legal Administration
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 6463

Dear Mr. Gordon:

The purpose of this letter is to provide the Commission with additional information from the Respondents on MUR 6463. On September 16, 2011, Mr. and Mrs. Antaramian and the other Respondents submitted a response to additional information filed by the Complainants on this matter. Since the filing of that response there have been additional developments which bear on this matter.

In our response to the Commission, we noted that certain expenses associated with an Obama Victory Fund event on October 8, 2008 were paid for by Mr. Antaramian. Mr. Antaramian expected that the expenses for the fundraising event would be reported as in-kind contributions to the Democratic National Committee (DNC) which was involved in organizing the event. However, as we noted in our original response, after further investigation Mr. Antaramian discovered that these costs were not reported as in-kind contributions by the DNC, or any other Committee, nor were they reimbursed for these expenses. Upon discovering this error, Mr. Antaramian took immediate steps to correct this oversight and requested that the DNC reimburse him for these expenses. A copy of our letter to the DNC was attached to our September 16 response. On March 26, 2012 Mr. Antaramian received reimbursement from the DNC in the amount of \$24,184.54. This fully reimburses Mr. Antaramian for all expenses related to the events on October 2008.

As we have explained in prior response, most of the allegations raised by Complainants have been speculative, inaccurate and misleading. Mr. Antaramian and the other Respondents in no way intended to violate federal campaign finance law or any other laws. Any questionable contributions (direct or in-kind), were inadvertent and, where questionable contributions have been

Hogan Lovells US LLP is a limited liability partnership registered in the District of Columbia. "Hogan Lovells" is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP, with offices in: Abu Dhabi, Alicante, Amsterdam, Baltimore, Beijing, Berlin, Brussels, Caracas, Colorado Springs, Denver, Dubai, Düsseldorf, Frankfurt, Hamburg, Hanoi, Ho Chi Minh City, Hong Kong, Houston, London, Los Angeles, Madrid, Miami, Milan, Moscow, Munich, New York, Northern Virginia, Paris, Philadelphia, Prague, Rome, San Francisco, Shanghai, Silicon Valley, Singapore, Tokyo, Ulaanbaatar, Warsaw, Washington DC. Associated offices: Budapest, Jeddah, Riyadh, Zagreb. For more information see www.hoganlovells.com

WDC - 035203/000004 - 3386441 v1

12044321294

Jeff Gordon

- 2 -

March 30, 2012

discovered, the Respondents have been reimbursed by the DNC in full. As such, we once again request that the Commission dismiss this matter.

Sincerely,



C. Michael Gilliland

Partner
mike.gilliland@hoganlovells.com
D +1 202 637 5619

12044321295